

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
JAY P. ACKERMAN	:	
BRENDA M. ACKERMAN	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	CASE NO. 1-20-bk-03076
JAY P. ACKERMAN	:	
BRENDA M. ACKERMAN	:	
Respondent	:	

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 31<sup>st</sup> day of December 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
- a. Pay stubs for the month of November 2024 for both Debtors

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 31<sup>st</sup> day of December 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

GARY J. IMBLUM, ESQUIRE  
4615 DERRY STREET  
HARRISBURG, PA 17111-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee